

TROY LAW, PLLC  
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*Attorney for the Plaintiffs, proposed FLSA Collective and  
potential Rule 23 Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**Case No. 17-cv-03043**

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FENG LIN,  
*on his own behalf and on behalf of others similarly  
situated*  
  
Plaintiff,

**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**

v.

QUALITY WOODS, INC.  
d/b/a Quality Woods;  
D C CABINET FACTORY INC.  
d/b/a Quality Woods;  
METROPOLITAN CABINET FACTORY, INC  
d/b/a Quality Woods;  
AOTIN TRADING INC.  
d/b/a Quality Woods; and  
CHAMPION CABINET INC.  
d/b/a Quality Woods;  
WEI GAO,  
WEI ZHANG CHEN  
a/k/a Dean Chen,  
DING CHEN, and  
JAMES WANG

Defendants.

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**PLEASE TAKE NOTICE** that upon the annexed Declaration of John Troy, sworn to on June 21, 2018, and all exhibits attached thereto, and upon all prior pleadings and proceedings herein, the undersigned shall move this Court, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, NY 11201, before the Honorable **DORA LIZETTE IRIZARRY** for an Order granting judgment by default against

Defendants QUALITY WOODS, INC. d/b/a Quality Woods; D C CABINET FACTORY INC. d/b/a Quality Woods; METROPOLITAN CABINET FACTORY, INC d/b/a Quality Woods; AOTIN TRADING INC. d/b/a Quality Woods; and CHAMPION CABINET INC. d/b/a Quality Woods; WEI GAO, WEI ZHANG CHEN a/k/a Dean Chen, DING CHEN, and JAMES WANG, pursuant Fed. R. Civ. P. 55(b)(2) and Local Rule 55.2(b).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 6.1(b) of the United States District Court for the Eastern District of New York, answering papers, if any, are to be served so as to be received by the undersigned no later than fourteen (14) days prior to the return date of the within motion once set by the Court.

Dated: Flushing, NY  
June 21, 2018

TROY LAW, PLLC

/s/ John Troy

John Troy (JT0481)